State of California California California Horse Racing Board

Complaint and Notice to Appear CHRB - 65 (REV. 11/01)

1010 Hurley Way, Suite 300 Sacramento, CA 95825

## **COMPLAINT**

CASE NUMBER: 06SA0075

The CHRB hereby files a complaint against PAUL AGUIRRE, for violation of CHRB Rule 1843 (a & d) &

1887 (a). The person named in this complaint holds a license as a Trainer, license number 069840-08/2008.

The offense alleged occurred on or about February 5, 2006 and

is as follows:

The Official Pre-Race Blood Sample #TC43872 taken on February 5, 2006 at Santa Anita was reported by Scott Stanley of the University of California, Davis Laboratories, to contain 38.1 millimoles per liter of Total Carbon Dioxide (TCO2) which exceeds the regulatory level. The sample was obtained from the horse 'JASJONJAKE' that was entered and ran in the 2<sup>nd</sup> race at Santa Anita on 2/05/06. Paul Aguirre is the trainer of record. The trainer did not request a duplicate sample.

Pursuant to Business and Professions Code Section 19420, 19440, and CHRB Rules, the stewards are empowered to impose penalties for violation of any provision of the CHRB Rules. Such penalties may consist of suspension of any license, fines, and exclusion from all racing enclosures under the jurisdiction of the Board or by any combination of these penalties.

Date :2/24/06	Complainant :Aschenbrenner

## NOTICE TO APPEAR

To you are hereby notified to appear before the Board of Stewards at the below listed location, date, and time.

Location: To Be Announced	Date: TBA	Time: <b>TBA</b>
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You are entitled to reasonable notice of the hearing and reasonable time to prepare for the hearing. If you need additional time to prepare for the hearing, you must contact the Board of Stewards within 72 hours of receipt of this notice. All requests for a continuance must be in writing. You should be prepared to justify your request for additional time. Granting or denial of a request for additional time is within the sound discretion of the stewards. The hearing will be conducted in accordance with the GOVERNING PROCEDURES FOR HEARING BEFORE THE BOARD OF STEWARDS, a copy of which is attached to this Complaint and Notice to Appear.

Investigator	Date
	2/24/06